

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	:	
	:	Chapter 11
KATERRA INC., <i>et al.</i> ,	:	
	:	Case No. 21-31861 (DRJ)
	:	
Debtors.	:	(Jointly Administered)
	:	
KATERRA INC., by and through Daniel R.	:	
Williams, as Plan Administrator on behalf of	:	
Katerra Inc. and related debtors	:	
	:	Adv. No.
Plaintiff,	:	
	:	
v.	:	
	:	
Deloitte & Touche LLP	:	
	:	
	:	
Defendant	:	
	:	

REDACTED COMPLAINT

Plaintiff concurrently filed its emergency motion (“Motion”) requesting that the Complaint be filed under seal because the Complaint refers to documents and information which were obtained pursuant to certain stipulated confidentiality agreements and protective orders (collectively, the “Protective Orders”) entered during the bankruptcy cases. Out of an abundance of caution, and in order for the Wind-Down Debtors to remain in compliance with the Protective Orders, the Complaint has been filed under seal pending further order of the Bankruptcy Court. At the earliest time possible, but in no event greater than twenty-one (21) days from the date of an order granting the Motion, the Plan Administrator will meet and confer with Deloitte & Touche LLP so that the most complete public version of the Complaint can be filed with this Court.

Dated: December 31, 2022

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